

**COMMONWEALTH OF KENTUCKY  
EXECUTIVE BRANCH ETHICS COMMISSION  
CASE NO. 13-03**

**IN RE: CHRIS PARSONS  
ALLEGED VIOLATION OF KRS CHAPTER 11A**

**INITIATING ORDER  
Initiation of Administrative Proceeding  
And Formal Complaint**

The Executive Branch Ethics Commission (the “Commission”), upon its own motion, initiated a preliminary investigation of Chris Parsons (the “Respondent” or “Parsons”), pursuant to KRS 11A.080(1), on January 30, 2012.

At all relevant times the Respondent was a “public servant” as defined in KRS 11A.010(9), and thus subject to the jurisdiction of the Commission.

The Commission initiated the preliminary investigation to determine whether it has sufficient probable cause to believe the Respondent violated provisions of KRS Chapter 11A, the Executive Branch Code of Ethics (also referred to herein as the “Ethics Code”).

The Commission focused its investigation upon the Respondent’s possible violation of the Ethics Code by influencing a public agency in derogation of the state at large; using his official position or office to obtain financial gain for himself; using his official position to secure or create privileges, exemptions, advantages, or treatment for others in derogation of the public interest; failing to avoid all conduct which might in any way lead members of the general public to conclude that he is using his official position to further his professional or private interest; and failing to notify his appointing authority of his outside employment.

The Commission notified the Respondent of the preliminary investigation by

letter dated February 1, 2012. During the course of the investigation, the Commission found probable cause to believe that violations of KRS Chapter 11A had occurred and voted on March 18, 2013, to initiate an administrative proceeding, pursuant to KRS 11A.080(4)(b) and KRS Chapter 13B, to determine whether the Respondent violated the Ethics Code as set forth in the Allegation of Violations, attached hereto and incorporated fully herein as Appendix A to this Initiating Order.

**IT IS THEREFORE ORDERED** that:

1. The Respondent shall file his answer to this Initiating Order within twenty (20) days from the date of service, verifying the truth and accuracy of any answer submitted.
2. The Respondent shall appear at a hearing to be scheduled by subsequent order and be prepared to defend against the Commission's allegations that he committed the Ethics Code violations set forth in the Allegation of Violations, attached hereto and incorporated fully herein as Appendix A to this Initiating Order.
3. A Hearing Officer will be appointed.
4. The Commission is represented by Kathryn H. Gabhart, General Counsel, and John R. Steffen, Executive Director. They may be contacted through the Commission's office at (502) 564-7954.
5. All original material plus one copy shall be submitted to the Executive Branch Ethics Commission, #3 Fountain Place, Frankfort, Kentucky 40601.
6. Once a Hearing Officer is appointed, a copy of all materials shall be served on the designated Hearing Officer as well.
7. The Respondent has the right to legal counsel during this proceeding. If

the Respondent retains legal counsel, that person shall file an appearance with the Commission, and thereafter all correspondence from the Commission to the Respondent shall be mailed or delivered to the Respondent's attorney.

8. The Respondent has the right to examine upon request, at least five (5) days prior to the hearing, a list of witnesses the Commission expects to call at the hearing, any evidence that will be used at the hearing and any exculpatory information in the Commission's possession.

9. The Respondent has the right to subpoena witnesses on his own behalf. If the Respondent subpoenas witnesses, he shall pay for all costs associated with the subpoenas' issuance, including any applicable witness fees.

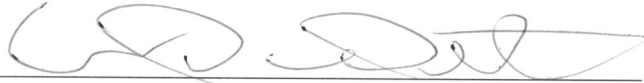
10. If the Respondent fails to attend or participate as required at any stage of the administrative hearing process without good cause shown, he may be held in default pursuant to KRS 13B.050(3)(h).

11. The Respondent has a right to appeal any final Commission order to the Franklin Circuit Court within thirty (30) days of service.

12. This proceeding is subject to KRS Chapter 11A, the Commission's regulations, the provisions of KRS Chapter 13B, and any Order issued by the Commission or its hearing officer issued during this administrative proceeding.

So ordered this 18th day of March 2013.

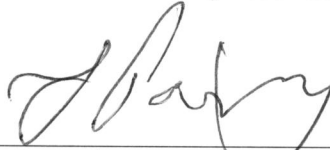
**EXECUTIVE BRANCH ETHICS COMMISSION:**



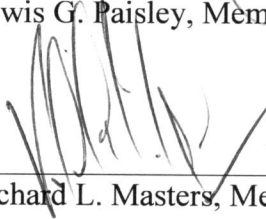
W. David Denton, Chair



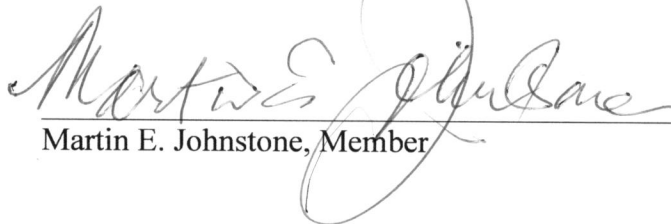
William G. Francis, Vice-Chair



Lewis G. Paisley, Member



Richard L. Masters, Member



Martin E. Johnstone, Member

**APPENDIX A  
CASE NO. 13-03  
INITIATING ORDER**

**ALLEGATION OF VIOLATIONS**

The Respondent, Chris Parsons, was at all relevant times an employee of the Commonwealth of Kentucky, serving in two different positions within the Department of Agriculture. As such, the Respondent was subject to the jurisdiction of the Commission. KRS 11A.010(9)(h).

During the course of its preliminary investigation, the Commission found probable cause to believe that Chris Parsons committed the following violations:

**COUNT I**

Chris Parsons, during his course of employment as Agricultural Inspector I, Office of State Veterinarian, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the course of his employment with the Office of State Veterinarian, Parsons was assigned the duties of observing stockyard sales and performing inspections, which required him to appear at designated stockyards and for which he was given a weekly itinerary. While Parsons consistently failed to appear at these stockyards, he, nevertheless, claimed work time on his timesheets for time spent allegedly performing his job duties. In doing so, Parsons collected pay for time that he falsely reported on his timesheets and, further, failed to fulfill his assigned job duties while receiving compensation.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

(1) No public servant, by himself or through others, shall knowingly:  
\*\*\*

- (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

## COUNT II

Chris Parsons, during his course of employment as Agricultural Inspector I, Office of State Veterinarian, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during January, February and March of 2011, the management of the Department reassigned Parsons' work station to Frankfort so as to closely monitor his work activities. Parsons failed to appear in Frankfort during February and March of 2011, but claimed work time on his timesheets and did not otherwise perform any work-related activities for the Department. Parsons also used his state-issued fuel card to purchase fuel on six occasions during that time period for personal use.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:  
\*\*\*
- (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;

- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

### **COUNT III**

Chris Parsons, during his course of employment as Agricultural Inspector I, Weights and Measures Branch, Division of Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the course of his employment with the Division of Regulation and Inspection, Parsons was assigned the duties of testing scales at various gas stations and grocery stores, for which he was given weekly and monthly itineraries. Parsons' vehicle was equipped with GPS monitoring equipment. During the months of November and December of 2012, Parsons consistently claimed work time on his timesheets for time that he did not work. Parsons claimed work time for time in which his work vehicle did not leave his home and during which he created no discernible work product. In doing so, Parsons collected wages and benefits for time that he falsely reported on his timesheets and, further, failed to fulfill his assigned job duties while receiving compensation.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
  - \*\*\*
  - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;

- (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
- (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

#### **COUNT IV**

Chris Parsons, during his course of employment as Agricultural Inspector I, Division of Weights and Measures, Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the months of November and December of 2012, Parsons used his state vehicle for non-work related reasons. Parsons drove his work vehicle for extended periods of time through areas not included in his assigned region, while failing to perform any work related activities during this time. Parsons thereby used state resources for his own personal benefit.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
  - \*\*\*
  - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
  - (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family; or
  - (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.



## COUNT V

Chris Parsons, during his course of employment as Agricultural Inspector I, Division of Weights and Measures, Regulation and Inspection, Department of Agriculture, used or attempted to use any means to influence a public agency in derogation of the state at large, used his official position to obtain financial gain for himself, and to secure or create privileges, exemptions, advantages, or treatment for himself in derogation of the public interest at large.

Specifically, during the months of November and December of 2012, Parsons fraudulently completed inspection reports for inspections he had not conducted. Parsons falsified the signatures of individuals he purported to be employees of, but were not actually employed by, the businesses he claimed to be inspecting. Parsons' submission of inspection reports for inspections he did not actually complete influenced his supervisors into believing Parsons had conducted these inspections, which is in derogation of the state at large.

These facts constitute violations of KRS 11A.020(1)(b), (c), and (d).

KRS 11A.020(1)(b)(c) and (d) provide:

- (1) No public servant, by himself or through others, shall knowingly:
  - \*\*\*
  - (b) Use or attempt to use any means to influence a public agency in derogation of the state at large;
  - (c) Use his official position or office to obtain financial gain for himself or any members of the public servant's family;  
or
  - (d) Use or attempt to use his official position to secure or create privileges, exemptions, advantages, or treatment for himself or others in derogation of the public interest at large.

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